

ESTTA Tracking number: **ESTTA483122**

Filing date: **07/12/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

## Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

### Opposer Information

Name	Rado Uhren AG (Rado Watch Co. Ltd.) (Montres Rado S.A.)		
Entity	Corporation	Citizenship	Switzerland
Address	Bielstrasse 43 2543 Lengnau, SWITZERLAND		

Attorney information	Mr. Jess M. Collen Collen IP, Intellectual Property Law, P.C. The Holyoke-Manhattan Building 80 South Highland Avenue Ossining, NY 10562 UNITED STATES jcollen@collenip.com, tgulick@collenip.com, docket@collenip.com Phone:914-941-5668
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### Applicant Information

Application No	85519480	Publication date	06/12/2012
Opposition Filing Date	07/12/2012	Opposition Period Ends	07/12/2012
Applicant	Savvy Cie, Inc. 2455 Hollywood Blvd. Hollywood, FL 33020 UNITED STATES		

### Goods/Services Affected by Opposition

Class 014. All goods and services in the class are opposed, namely: Watches
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### Grounds for Opposition


Priority and likelihood of confusion	Trademark Act section 2(d)
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### Marks Cited by Opposer as Basis for Opposition


U.S. Registration No.	1729207	Application Date	02/28/1992
Registration Date	11/03/1992	Foreign Priority Date	NONE
Word Mark	RADO		
Design Mark			
Description of Mark	NONE		

Goods/Services	Class 014. First use: First Use: 1958/04/12 First Use In Commerce: 1958/04/12 watches and parts thereof
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U.S. Registration No.	788733	Application Date	06/11/1964
Registration Date	04/27/1965	Foreign Priority Date	NONE
Word Mark	RADO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class U027 (International Class 014). First use: First Use: 1958/04/12 First Use In Commerce: 1958/04/12 WATCHES AND PARTS THEREOF		

U.S. Registration No.	982878	Application Date	01/15/1973
Registration Date	04/30/1974	Foreign Priority Date	NONE
Word Mark	RADO DIASTAR		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class U027 (International Class 014). First use: First Use: 1962/00/00 First Use In Commerce: 1963/00/00 CLOCKS AND WATCHES AND PARTS THEREOF		

U.S. Registration No.	1879674	Application Date	03/23/1993
Registration Date	02/21/1995	Foreign Priority Date	NONE

Word Mark	RADO FLORENCE
Design Mark	
Description of Mark	NONE
Goods/Services	Class 014. First use: First Use: 1985/01/10 First Use In Commerce: 1985/00/00 watches and parts thereof

U.S. Registration No.	2127746	Application Date	04/02/1996
Registration Date	01/06/1998	Foreign Priority Date	12/21/1995
Word Mark	RADO DIAQUEEN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1996/05/00 First Use In Commerce: 1996/06/01 watches and parts thereof		

U.S. Registration No.	2189057	Application Date	04/07/1997
Registration Date	09/15/1998	Foreign Priority Date	NONE
Word Mark	RADO DIAMASTER		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1997/06/00 First Use In Commerce: 1997/06/00 watches and parts thereof		


U.S. Registration No.	2735154	Application Date	06/20/2000
Registration Date	07/08/2003	Foreign Priority Date	03/14/2000
Word Mark	RADO ESENZA		


Design Mark	<b>RADO eSenza</b>
Description of Mark	NONE
Goods/Services	Class 014. First use: First Use: 2001/04/30 First Use In Commerce: 2001/07/19 Jewelry; horological and chronometric instruments, namely, watches and chronometers

U.S. Registration No.	3307464	Application Date	05/03/2006
Registration Date	10/09/2007	Foreign Priority Date	03/16/2006
Word Mark	RADO TRUE		
Design Mark	<b>RADO TRUE</b>		
Description of Mark	NONE		
Goods/Services	Class 014. First use: Precious metals and their alloys, namely white gold, yellow gold, pink gold; jewelry watches, precious stones, namely diamond, sapphire, ruby, emerald; horological instruments, namely chronographs, chronometers for use as watches, watches, watch movements		


U.S. Application No.	85506008	Application Date	12/29/2011
Registration Date	NONE	Foreign Priority Date	11/24/2011
Word Mark	RADO R-ONE		
Design Mark	<b>RADO R-ONE</b>		
Description of Mark	NONE		
Goods/Services	Class 014. First use:		

	Jewelry; horological and chronometric instruments, namely watches and chronometers
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U.S. Application No.	85254905	Application Date	03/01/2011
Registration Date	NONE	Foreign Priority Date	10/25/2010
Word Mark	RADO D-STAR		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: Jewelry; horological and chronometric instruments, namely, watches and chronometers		

U.S. Application No.	85505985	Application Date	12/29/2011
Registration Date	NONE	Foreign Priority Date	11/24/2011
Word Mark	RADO SPECCHIO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: Jewelry; horological and chronometric instruments, namely watches and chronometers		

U.S. Application No.	85506000	Application Date	12/29/2011
Registration Date	NONE	Foreign Priority Date	11/24/2011
Word Mark	RADO HYPERCHROME		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 014. First use: Jewelry; horological and chronometric instruments, namely watches and chronometers

Attachments	72195450#TMSN.gif ( 1 page )( bytes ) 72445891#TMSN.gif ( 1 page )( bytes ) 74371183#TMSN.gif ( 1 page )( bytes ) 76074838#TMSN.gif ( 1 page )( bytes ) 79024561#TMSN.jpeg ( 1 page )( bytes ) 85506008#TMSN.jpeg ( 1 page )( bytes ) 85254905#TMSN.jpeg ( 1 page )( bytes ) 85505985#TMSN.jpeg ( 1 page )( bytes ) 85506000#TMSN.jpeg ( 1 page )( bytes ) N1466 notice of opposition.pdf ( 51 pages )(1206902 bytes )
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### Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Jess M. Collen/
Name	Mr. Jess M. Collen
Date	07/12/2012

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE TRADEMARK  
TRIAL AND APPEAL BOARD**

Applicant : Savvy Cie, Inc.  
Serial No. : 85519480  
Filed : January 18, 2012  
For : RadeK  
Published : June 12, 2012

UNITED STATES PATENT AND TRADEMARK OFFICE  
Box TTAB-Fee  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**NOTICE OF OPPOSITION**

The Opposer, Rado Uhren AG (Rado Watch Co. Ltd.) (Montres Rado S.A.), a corporation duly organized and existing under the laws of Switzerland, located at Bielstrasse 43, 2543, Lengnau, Switzerland (referred to as “Opposer”), believes it would be damaged by the registration of the mark shown in the above-identified application, and hereby opposes the same, pursuant to 15 U.S.C. § 1063 and 37 C.F.R. § 2.104.

As grounds for opposition it is alleged that:

(1) Opposer is and has been engaged in the sale and marketing of goods under the RADO mark since a time prior to the constructive use date of the intent to use application filed by Savvy Cie, Inc. (“Applicant”).

(2) Opposer is the owner of the following valid United States Trademark registrations:

- RADO	Reg. No. 1729207	Ex. A
- RADO (& Design)	Reg. No. 0788733	Ex. B

- RADO DIASTAR	Reg. No. 0982878	Ex. C
- RADO FLORENCE	Reg. No.1879674	Ex. D
- RADO DIAQUEEN	Reg. No. 2127746	Ex. E
- RADO DIAMASTER	Reg. No. 2189057	Ex. F
- RADO ESENZA	Reg. No. 2735154	Ex. G
- RADO TRUE	Reg. No. 3307464	Ex. H

and others.

(3) Opposer is also the owner of numerous valid United States Trademark applications:

- RADO R-ONE	Ser. No. 85506008	Ex. I
- RADO D-STAR	Ser. No. 85254905	Ex. J
- RADO SPEECHO	Ser. No. 85505985	Ex. K
- RADO HYPERCHROME	Ser. No.85506000	Ex. L

and others (collectively with the list above in paragraph (2) referred to as the “RADO Marks”).

(3) Opposer uses its RADO Marks on a variety of watches, chronometers, and other horological and chronometric instruments, goods in International Class 014.

(4) Opposer’s registrations are prima facie proof of ownership and use of the mark from the original date of filing of the application, pursuant to 15 U.S.C. § 1057(b), and of the exclusive right to use the registered marks in commerce.

(5) Opposer has used its RADO Marks in commerce extensively and has acquired considerable and valuable goodwill and wide-scale recognition for its mark. The public has come to associate the RADO Marks with the Opposer and Opposer’s goods.



(6) Consumers encountering the Applicant's mark and goods are likely to believe that such goods originate from or are authorized or sponsored by the Opposer, in view of the wide scale fame of the Opposer's RADO Marks and the indistinguishable differences between Opposer's marks and goods and the Applicant's mark and goods.

(7) Use of the mark RADEK will be likely to lead consumers and potential consumers of the Applicant's goods and services to believe that the mark is an addition to the Opposer's RADO Marks. The Consumer will mistakenly perceive the goods sold under the Applicant's trademark as the natural result of a continuation or expansion of Opposer's RADO Marks, and that the Applicant's goods thus emanate from Opposer.

(8) The Applicant has appropriated much of the Opposer's trademark, and has varied from Opposer's mark by merely changing the "o" to visually similar letter "e" and adding a capital letter "K" to the end thereby changing RADO to RADEK. Such an alteration does not serve to materially change the appearance of the mark. Confusion is likely. The RADEK mark is, under Trademark Office practice, still confusingly similar to RADO in appearance.

(9) The sound of the Opposer's marks and the Applicant's mark are similar. Among the several pronunciations of which Applicant's mark are capable, two are RAD-EK and RAD-K, both of which are highly confusing to RAD-O.

(10) Consumers who see and hear the Applicant's mark will likely confuse it with the Opposer's RADO Marks.

(11) The Opposer sells watches and the Applicant sells watches.

(12) The Opposer's marks are registered for watches and parts thereof in class 14, and the Applicant's mark is pending for watches, clocks, and wristbands and other goods in class 14.

Consumers would be likely to believe that the Opposer is the source of Applicant's goods, or that Applicant's use of the RADEK mark would designate the Opposer as the source of those goods.

(13) Applicant's RADEK mark is confusingly similar to Opposer's RADO Marks and is likely, when applied to the goods of the Applicant, to cause confusion under 15 U.S.C. § 1052(d). Applicant's mark so resembles Opposer's marks registered in the Patent and Trademark Office, as to be likely, when used on or in connection with the goods and services of the Applicant's, to cause confusion, or to cause mistake, or to deceive.

(14) On information and belief, both the Applicant's mark and Opposer's marks are likely to be advertised and sold through the same or similar channels of distribution.

(15) On information and belief, the Applicant has adopted their RADEK trademark with full knowledge of the Opposer's RADO Marks.

(16) The Opposer's RADO Marks are famous trademarks.

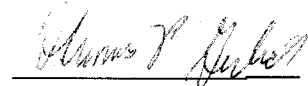
(17) On information and belief, the Applicant's mark is also likely to diminish and dilute the value and distinctive character of the RADO Marks, to the great detriment of the Opposer's famous RADO Marks, thus damaging the Opposer.

(18) Applicant's mark so resembles the Opposer's RADO Marks as used in the United States and not abandoned, as to be likely to cause confusion, or to cause mistake or to deceive.

Wherefore, Opposer prays that this application Serial No. 85519480 be refused, that no registration be issued thereon to Applicant and that this Opposition be sustained in favor of Opposer.

Respectfully submitted for Opposer,

By: \_\_\_\_\_



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Thomas P. Gulick  
COLLEN IP  
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80 South Highland Ave  
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[jcollen@collenip.com](mailto:jcollen@collenip.com)  
*Attorneys for Opposer, Rado Uhren AG*  
*(Rado Watch Co. Ltd) (Montres Rado S.A.)*

JMC/TPG:sjc

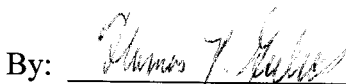
Enclosures: Opposition fee of \$300.00/class (\$300.00)  
Exhibits A-L

SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 03-2465.

I HEREBY CERTIFY THAT THIS CORRESPONDENCE IS BEING FILED ELECTRONICALLY WITH THE UNITED STATES PATENT AND TRADEMARK OFFICE ON JULY 12, 2012.

COLLEN IP

By: \_\_\_\_\_



Date: July 12, 2012

# Exhibit A

Int. Cl.: 14

Prior U.S. Cl.: 27

**United States Patent and Trademark Office**

**Reg. No. 1,729,207**

Registered Nov. 3, 1992

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO**

RADO UHREN AG (RADO WATCH CO. LTD.)  
(MONTRES RADO S.A.) (SWITZERLAND  
CORPORATION)  
BIELSTRASSE 43  
2543 LENGNAU, SWITZERLAND

FIRST USE 4-12-1958; IN COMMERCE  
4-12-1958.

OWNER OF U.S. REG. NOS. 788,733 AND  
982,878.

SER. NO. 74-250,769, FILED 2-28-1992.

FOR: WATCHES AND PARTS THEREOF, IN  
CLASS 14 (U.S. CL. 27).

ANTHONY LUPO, EXAMINING ATTORNEY



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**For Serial Number: 74250769**

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# Exhibit B

# United States Patent Office

788,733  
Registered Apr. 27, 1965

## PRINCIPAL REGISTER Trademark

Ser. No. 195,450, filed June 11, 1964



Schlup & Cie. A.G. (Schlup & Cie. S.A.) (Schlup & Co.  
Ltd.), Uhrenfabrik (Swiss corporation)  
Bielstrasse 43  
Lengnau, Switzerland

For: WATCHES AND PARTS THEREOF; in CLASS  
27.  
First use Apr. 12, 1958; in commerce Apr. 12, 1958.  
Owner of Swiss Reg. No. 169,459, dated Mar. 11, 1958;  
and U.S. Reg. No. 503,926.





## United States Patent and Trademark Office

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## Trademark Assignment Abstract of Title

**Total Assignments: 1****Serial #:** 72195450**Filing Dt:** 06/11/1964**Reg #:** 788733**Reg. Dt:** 04/27/1965**Registrant:** SCHLUP & CIE. A.G. (SCHLUP & CIE. S.A.)**Mark:** RADO**Assignment: 1****Reel/Frame:** 0323/0265**Received:****Recorded:** 03/31/1978**Pages:** 4**Conveyance:** CHANGE OF NAME 19771007**Assignor:** SCHLUP & CIE A.G. (SCHLUP & CIE S.A.) (SCHLUP & CO. LTD.)**Exec Dt:** 01/31/1978**Entity Type:** UNKNOWN**Citizenship:** NONE**Assignee:** RADO UHREN A.G. (RADO WATCH CO. LTD.) (MONTRES RADO S.A.)**Entity Type:** UNKNOWN**Citizenship:** NONE**Correspondent:** MCGLEW AND TUTTLE, P.C.  
28 WEST 44TH STREET  
NEW YORK, NY 10036

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# Exhibit C

# United States Patent Office

982,878

Registered Apr. 30, 1974

## PRINCIPAL REGISTER Trademark

Ser. No. 445,891, filed Jan. 15, 1973



**RADO**  
**DIASTAR**

Schlup & Cie. AG (Schlup & Cie. S.A.) (Schlup & Co.  
Ltd.) (Swiss corporation)  
Bielstrasse 43  
Lengnau, near Biel, Switzerland

For: CLOCKS AND WATCHES AND PARTS  
THEREOF, in CLASS 27 (INT. CL. 14).  
First use 1962; in commerce 1963.  
Owner of Swiss Reg. No. 260,733, dated Sept. 7, 1972.



## United States Patent and Trademark Office

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## Trademark Assignment Abstract of Title

## Total Assignments: 1

Serial #: [72445891](#)

Filing Dt: 01/15/1973

Reg #: [982878](#)

Reg. Dt: 04/30/1974

Registrant: SCHLUP &amp; CIE. AG (SCHLUP &amp; CIE. S.A.) (S

Mark: RADO DIASTAR

## Assignment: 1

Reel/Frame: [0323/0265](#)

Received:

Recorded: 03/31/1978

Pages: 4

Conveyance: CHANGE OF NAME 19771007

Assignor: [SCHLUP & CIE A.G. \(SCHLUP & CIE S.A.\) \(SCHLUP & CO. LTD.\)](#)

Exec Dt: 01/31/1978

Entity Type: UNKNOWN

Citizenship: NONE

Assignee: [RADO UHREN A.G. \(RADO WATCH CO. LTD.\) \(MONTRES RADO S.A.\)](#)

Entity Type: UNKNOWN

Citizenship: NONE

Correspondent: MCGLEW AND TUTTLE, P.C.  
28 WEST 44TH STREET  
NEW YORK, NY 10036

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# Exhibit D

**Int. Cl.: 14**

**Prior U.S. Cls.: 27 and 28**

**United States Patent and Trademark Office**

**Reg. No. 1,879,674**

**Registered Feb. 21, 1995**

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO  
FLORENCE**

**RADO UHREN AG (RADO WATCH CO. LTD.)  
(MONTRES RADO SA) (SWITZERLAND  
CORPORATION)  
LEGNAU, SWITZERLAND**

**OWNER OF SWITZERLAND REG. NO.  
396913, DATED 6-12-1992, EXPIRES 6-12-2012.**

**OWNER OF U.S. REG. NOS. 788,733 AND  
982,878.**

**FOR: WATCHES AND PARTS THEREOF, IN  
CLASS 14 (U.S. CLS. 27 AND 28).**

**SER. NO. 74-371,183, FILED 3-23-1993.**

**FIRST USE 1-10-1985; IN COMMERCE  
0-0-1985.**

**JYLL A. SMITH, EXAMINING ATTORNEY**



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**For Serial Number: 74371183**

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# Exhibit E



**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28, and 50**

**Reg. No. 2,127,746**

**United States Patent and Trademark Office**

**Registered Jan. 6, 1998**

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO DIAQUEEN**

RADO UHREN AG (RADO WATCH CO.LTD.)  
(MONTRES RADO S.A.) (SWITZERLAND  
CORPORATION)  
LEGNAU, SWITZERLAND

FOR: WATCHES AND PARTS THEREOF, IN  
CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 5-0-1996; IN COMMERCE  
6-1-1996.

PRIORITY CLAIMED UNDER SEC. 44(D) ON  
SWITZERLAND APPLICATION NO. 13869/1995,  
FILED 12-1-1995, REG. NO. 423304, EXPIRES  
12-1-2005.

OWNER OF U.S. REG. NOS. 788,733, 1,879,674,  
AND OTHERS.

SN 75-090,071, FILED 4-2-1996.

M. E. BODSON, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

United States Patent and Trademark Office

Corrected

Reg. No. 2,127,746

Registered Jan. 6, 1998

OG Date Aug. 25, 1998

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO DIAQUEEN**

RADO UHREN AG (RADO WATCH  
CO.LTD.) (MONTRES RADO S.A.)  
(SWITZERLAND CORPORATION)  
LEGNANAU, SWITZERLAND

PRIORITY CLAIMED UNDER SEC.  
44(D) ON SWITZERLAND APPLICA-  
TION NO. 13869/1995, FILED 12-21-1995,  
REG. NO. 423304, DATED 5-28-1996, EX-  
PIRES 12-21-2005.

OWNER OF U.S. REG. NOS. 788,733,  
1,879,674 AND OTHERS.

FOR: WATCHES AND PARTS THERE-  
OF, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND  
50).

FIRST USE 5-0-1996; IN COMMERCE  
6-1-1996.

SER. NO. 75-090,071, FILED 4-2-1996.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Aug. 25, 1998.*

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**For Serial Number: 75090071**

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# Exhibit F

**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28 and 50**

**Reg. No. 2,189,057**

**United States Patent and Trademark Office**

**Registered Sep. 15, 1998**

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO DIAMASTER**

**RADO UHREN AG (RADO WATCH CO. LTD.)  
(MONTRES RADO S.A.) (SWITZERLAND  
CORPORATION)  
BIELSTRASSE 43  
2543 LENGNAU PRES BIENNE, SWITZER-  
LAND**

**FOR: WATCHES AND PARTS THEREOF, IN  
CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).**

**FIRST USE 6-0-1997; IN COMMERCE  
6-0-1997.**

**OWNER OF SWITZERLAND REG. NO.  
314226, DATED 9-7-1981, EXPIRES 9-7-2001.**

**OWNER OF U.S. REG. NOS. 788,733, 1,879,674  
AND OTHERS.**

**SER. NO. 75-279,545, FILED 4-7-1997.**

**STEVEN PEREZ, EXAMINING ATTORNEY**



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**For Serial Number: 75279545**

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# Exhibit G

**Int. Cl.: 14**

**Prior U.S. Cls.: 2, 27, 28, and 50**

**Reg. No. 2,735,154**

**United States Patent and Trademark Office**

**Registered July 8, 2003**

**TRADEMARK  
PRINCIPAL REGISTER**

**RADO eSenza**

**RADO UHREN AG (RADO WATCH CO. LTD.)  
(MONTRES RADO S.A.) (SWITZERLAND  
CORPORATION)  
LEGNAU, SWITZERLAND**

**PRIORITY CLAIMED UNDER SEC. 44(D) ON  
SWITZERLAND APPLICATION NO. 03021/2000,  
FILED 3-14-2000, REG. NO. 476279, EXPIRES 3-14-  
2010.**

**FOR: JEWELRY; HOROLOGICAL AND  
CHRONOMETRIC INSTRUMENTS, NAMELY,  
WATCHES AND CHRONOMETERS, IN CLASS 14  
(U.S. CLS. 2, 27, 28 AND 50).**

**OWNER OF U.S. REG. NOS. 1,729,207, 2,127,746,  
AND OTHERS.**

**SN 76-074,838, FILED 6-20-2000.**

**FIRST USE 4-30-2001; IN COMMERCE 7-19-2001.**

**SCOTT OSICK, EXAMINING ATTORNEY**





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**No assignment has been recorded at the USPTO**

**For Serial Number: 76074838**

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Web interface last modified: Jan 26, 2012 v.2.3.1

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# Exhibit H

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

United States Patent and Trademark Office

Reg. No. 3,307,464

Registered Oct. 9, 2007

TRADEMARK  
PRINCIPAL REGISTER

RADO TRUE

RADO UHREN AG; (RADO WATCH CO. LTD.);  
(MONTRES RADO S.A.) (SWITZERLAND  
JOINT STOCK COMPANY)

45, BIELSTRASSE

CH-2543 LENGNAU

SWITZERLAND

FOR: PRECIOUS METALS AND THEIR ALLOYS,  
NAMELY WHITE GOLD, YELLOW GOLD, PINK  
GOLD; JEWELRY WATCHES, PRECIOUS STONES,  
NAMELY DIAMOND, SAPPHIRE, RUBY, EMER-  
ALD; HOROLOGICAL INSTRUMENTS, NAMELY  
CHRONOGRAPHS, CHRONOMETERS FOR USE AS  
WATCHES, WATCHES, WATCH MOVEMENTS, IN  
CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

THE MARK CONSISTS OF STANDARD CHAR-  
ACTERS WITHOUT CLAIM TO ANY PARTICULAR  
FONT, STYLE, SIZE, OR COLOR.

PRIORITY DATE OF 3-16-2006 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION  
0886754 DATED 5-3-2006, EXPIRES 5-3-2016.

OWNER OF U.S. REG. NOS. 1,729,207, 2,189,057  
AND OTHERS.

SER. NO. 79-024,561, FILED 5-3-2006.

CHRISTOPHER OTT, EXAMINING ATTORNEY



United States Patent and Trademark Office

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**No assignment has been recorded at the USPTO**

**For Serial Number: 79024561**

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# Exhibit I

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2012-07-11 14:58:20 ET**

**Serial Number:** 85506008 [Assignment Information](#) [Trademark Document Retrieval](#)

**Registration Number:** (NOT AVAILABLE)

**Mark**

**RADO R-ONE**

**(words only):** RADO R-ONE

**Standard Character claim:** Yes

**Current Status:** A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.

**Date of Status:** 2012-02-11

**Filing Date:** 2011-12-29

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 112

**Attorney Assigned:**  
LEASER ANDREW C

**Current Location:** M3X -TMO Law Office 112 - Examining Attorney Assigned

**Date In Location:** 2012-02-11

---

**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---

1. Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)

**Address:**

Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)  
Bielstrasse 45  
2543 Lengnau  
Switzerland

**Legal Entity Type:** Corporation**State or Country of Incorporation:** Switzerland

---

**GOODS AND/OR SERVICES**

---

**International Class:** 014**Class Status:** Active

Jewelry; horological and chronometric instruments, namely watches and chronometers

**Basis:** 1(b), 44(d), 44(e)**First Use Date:** (DATE NOT AVAILABLE)**First Use in Commerce Date:** (DATE NOT AVAILABLE)

---

**ADDITIONAL INFORMATION**

---

**Foreign Application Number:** 63162/2011**Foreign Registration Number:** 623280**Foreign Registration Date:** 2011-12-01**Country:** Switzerland**Foreign Filing Date:** 2011-11-24**Foreign Expiration Date:** 2021-11-24

---

**MADRID PROTOCOL INFORMATION**

---

(NOT AVAILABLE)

---

**PROSECUTION HISTORY**

---

**NOTE: To view any document referenced below, click on the link to "Trademark Document Retrieval" shown near the top of this page.**

2012-02-11 - Notification Of Non-Final Action E-Mailed

2012-02-11 - Non-final action e-mailed

2012-02-11 - Non-Final Action Written

2012-02-08 - Assigned To Examiner

2012-01-06 - New Application Office Supplied Data Entered In Tram

2012-01-02 - New Application Entered In Tram

---

**ATTORNEY/CORRESPONDENT INFORMATION**

---

**Attorney of Record**

Jess M. Collen

**Correspondent**

JESS M. COLLEN

COLLEN IP, INTELLECTUAL PROPERTY LAW, P.

80 S HIGHLAND AVE

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Phone Number: (914) 941-5668

Fax Number: (914) 941-6091

**Domestic Representative**

Jess M. Collen

Phone Number: (914) 941-5668

Fax Number: (914) 941-6091

---





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**No assignment has been recorded at the USPTO**

**For Serial Number: 85506008**

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# Exhibit J

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2012-07-11 14:58:56 ET**

**Serial Number:** 85254905 [Assignment Information](#) [Trademark Document Retrieval](#)

**Registration Number:** (NOT AVAILABLE)

**Mark**

**RADO D-STAR**

**(words only):** RADO D-STAR

**Standard Character claim:** Yes

**Current Status:** Notice of Allowance (NOA) sent (issued) to the applicant. Applicant must file a Statement of Use or Extension Request within six months of the NOA issuance date.

**Date of Status:** 2012-02-07

**Filing Date:** 2011-03-01

**The Notice of Allowance Date is:** 2012-02-07

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 116

**Attorney Assigned:**  
BRECKENFELD WILLIAM G

**Current Location:** 700 -Intent To Use Section

**Date In Location:** 2012-02-07

---

**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---

1. Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)

**Address:**

Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)  
Bielstrasse 45  
2543 Lengnau  
Switzerland

**Legal Entity Type:** Corporation**State or Country of Incorporation:** Switzerland

---

**GOODS AND/OR SERVICES**

---

**International Class:** 014**Class Status:** Active

Jewelry; horological and chronometric instruments, namely, watches and chronometers

**Basis:** 1(b), 44(e)**First Use Date:** (DATE NOT AVAILABLE)**First Use in Commerce Date:** (DATE NOT AVAILABLE)

---

**ADDITIONAL INFORMATION**

---

**Prior Registration Number(s):**

788733

3307464

**Foreign Application Number:** 61494/2010**Foreign Registration Number:** 607419**Foreign Registration Date:** 2010-11-02**Country:** Switzerland**Foreign Filing Date:** 2010-10-25**Foreign Expiration Date:** 2020-10-25

---

**MADRID PROTOCOL INFORMATION**

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(NOT AVAILABLE)

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**PROSECUTION HISTORY**

---

**NOTE: To view any document referenced below, click on the link to "Trademark Document Retrieval" shown near the top of this page.**

2012-02-07 - NOA E-Mailed - SOU Required From Applicant

2011-12-13 - Official Gazette Publication Confirmation E-Mailed

2011-12-13 - Published for opposition

2011-11-23 - Notification Of Notice Of Publication E-Mailed  
2011-11-08 - Law Office Publication Review Completed  
2011-11-04 - Approved For Pub - Principal Register  
2011-11-03 - Teas/Email Correspondence Entered  
2011-11-03 - Communication received from applicant  
2011-10-26 - Assigned To LIE  
2011-10-17 - TEAS Response to Office Action Received  
2011-06-09 - Notification Of Non-Final Action E-Mailed  
2011-06-09 - Non-final action e-mailed  
2011-06-09 - Non-Final Action Written  
2011-06-01 - Assigned To Examiner  
2011-03-04 - New Application Office Supplied Data Entered In Tram  
2011-03-04 - New Application Entered In Tram

---

**ATTORNEY/CORRESPONDENT INFORMATION**

---

**Attorney of Record**

Jess M. Collen

**Correspondent**

JESS M. COLLEN  
COLLEN IP, INTELLECTUAL PROPERTY LAW, P.  
80 S HIGHLAND AVE  
OSSINING, NY 10562-5615  
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Fax Number: (914) 941-6091

**Domestic Representative**

Jess M. Collen  
Phone Number: (914) 941-5668  
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---



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**No assignment has been recorded at the USPTO**

**For Serial Number: 85254905**

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Web interface last modified: Jan 26, 2012 v.2.3.1

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# Exhibit K

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2012-07-11 14:57:46 ET**

**Serial Number:** 85505985 [Assignment Information](#) [Trademark Document Retrieval](#)

**Registration Number:** (NOT AVAILABLE)

**Mark**

**RADO SPECCHIO**

**(words only):** RADO SPECCHIO

**Standard Character claim:** Yes

**Current Status:** A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.

**Date of Status:** 2012-02-11

**Filing Date:** 2011-12-29

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 112

**Attorney Assigned:**  
LEASER ANDREW C

**Current Location:** M3X -TMO Law Office 112 - Examining Attorney Assigned

**Date In Location:** 2012-02-11

---

**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---



1. Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)

**Address:**

Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)  
Bielstrasse 45  
2543 Lengnau  
Switzerland

**Legal Entity Type:** Corporation

**State or Country of Incorporation:** Switzerland

---

**GOODS AND/OR SERVICES**

---

**International Class:** 014

**Class Status:** Active

Jewelry; horological and chronometric instruments, namely watches and chronometers

**Basis:** 1(b), 44(d), 44(e)

**First Use Date:** (DATE NOT AVAILABLE)

**First Use in Commerce Date:** (DATE NOT AVAILABLE)

---

**ADDITIONAL INFORMATION**

---

**Foreign Application Number:** 63164/2011

**Foreign Registration Number:** 623282

**Foreign Registration Date:** 2011-12-01

**Country:** Switzerland

**Foreign Filing Date:** 2011-11-24

**Foreign Expiration Date:** 2021-11-24

---

**MADRID PROTOCOL INFORMATION**

---

(NOT AVAILABLE)

---

**PROSECUTION HISTORY**

---

**NOTE: To view any document referenced below, click on the link to "Trademark Document Retrieval" shown near the top of this page.**

2012-02-11 - Notification Of Non-Final Action E-Mailed

2012-02-11 - Non-final action e-mailed

2012-02-11 - Non-Final Action Written

2012-02-08 - Assigned To Examiner

2012-01-06 - New Application Office Supplied Data Entered In Tram

2012-01-02 - New Application Entered In Tram

---

**ATTORNEY/CORRESPONDENT INFORMATION**

---

**Attorney of Record**

Jess M. Collen

**Correspondent**

JESS M. COLLEN

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---



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**No assignment has been recorded at the USPTO**

**For Serial Number: 85505985**

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# Exhibit L

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2012-07-11 14:57:20 ET**

**Serial Number:** 85506000 [Assignment Information](#) [Trademark Document Retrieval](#)

**Registration Number:** (NOT AVAILABLE)

**Mark**

**RADO HYPERCHROME**

**(words only):** RADO HYPERCHROME

**Standard Character claim:** Yes

**Current Status:** A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.

**Date of Status:** 2012-03-07

**Filing Date:** 2011-12-29

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 112

**Attorney Assigned:**  
LEASER ANDREW C

**Current Location:** M3X -TMO Law Office 112 - Examining Attorney Assigned

**Date In Location:** 2012-03-07

---

**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---

1. Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)

**Address:**

Rado Uhren AG (Rado Watch Co. Ltd) (Montres Rado SA)  
Bielstrasse 45  
2543 Lengnau  
Switzerland

**Legal Entity Type:** Corporation**State or Country of Incorporation:** Switzerland

---

**GOODS AND/OR SERVICES**

---

**International Class:** 014**Class Status:** Active

Jewelry; horological and chronometric instruments, namely watches and chronometers

**Basis:** 1(b), 44(d), 44(e)**First Use Date:** (DATE NOT AVAILABLE)**First Use in Commerce Date:** (DATE NOT AVAILABLE)

---

**ADDITIONAL INFORMATION**

---

**Prior Registration Number(s):**

788733

982878

1729207

**Foreign Application Number:** 63163/2011**Foreign Registration Number:** 623281**Foreign Registration Date:** 2011-12-01**Country:** Switzerland**Foreign Filing Date:** 2011-11-24**Foreign Expiration Date:** 2021-11-24

---

**MADRID PROTOCOL INFORMATION**

---

(NOT AVAILABLE)

---

**PROSECUTION HISTORY**

---

**NOTE:** To view any document referenced below, click on the link to "Trademark Document Retrieval" shown near the top of this page.

2012-03-07 - Notification Of Non-Final Action E-Mailed

2012-03-07 - NON-FINAL ACTION E-MAILED

2012-03-07 - Non-Final Action Written

2012-03-06 - Teas/Email Correspondence Entered  
2012-03-06 - Communication received from applicant  
2012-03-06 - TEAS Response to Office Action Received  
2012-02-11 - Notification Of Non-Final Action E-Mailed  
2012-02-11 - Non-final action e-mailed  
2012-02-11 - Non-Final Action Written  
2012-02-08 - Assigned To Examiner  
2012-01-07 - Notice Of Pseudo Mark Mailed  
2012-01-06 - New Application Office Supplied Data Entered In Tram  
2012-01-02 - New Application Entered In Tram

---

**ATTORNEY/CORRESPONDENT INFORMATION**

---

**Attorney of Record**

Jess M. Collen

**Correspondent**

JESS M. COLLEN  
COLLEN IP, INTELLECTUAL PROPERTY LAW, P.  
80 S HIGHLAND AVE  
OSSINING, NY 10562-5615  
Phone Number: (914) 941-5668  
Fax Number: (914) 941-6091

**Domestic Representative**

Jess M. Collen  
Phone Number: (914) 941-5668  
Fax Number: (914) 941-6091

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**For Serial Number: 85506000**

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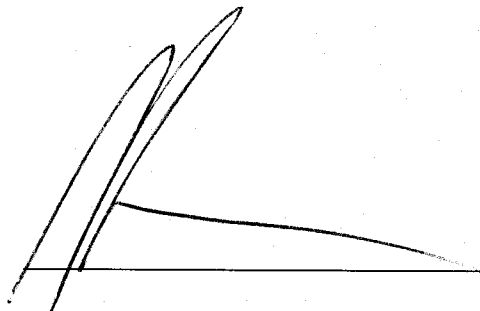


**CERTIFICATE OF SERVICE**

I, Peter Mulhern, hereby certify that I caused true and correct copy of the following Notice of Opposition to be served upon:

Savvy Cie, Inc.  
2455 Hollywood Blvd  
Hollywood, FL 33020-6605

via first-class mail, postage pre-paid. Said service having taken place this 12th day of July, 2012.

A handwritten signature in black ink, consisting of a large, stylized capital 'P' followed by a horizontal line extending to the right.